

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Investigation of Proposed Updates to the     )  
Routing Data Base System (RDBS) and     )     Docket No. 010102-TP  
Business Rating Input Database System     )  
(BRIDS) Affecting the Tampa     )  
Telecommunications Carriers     )  

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**REBUTTAL TESTIMONY OF DENISE V. THOMAS**

**ON BEHALF OF**

**WORLDCOM, INC.**

**March 5, 2001**

DOCUMENT NUMBER-DATE

**03234 MAR 13 2001**

FPSC-RECORDS/REPORTING

1       **Q.    PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2       A.    My name is Denise V. Thomas. My business address is 2678 Bishop Drive,  
3           Suite 200, San Ramon, CA 94583.

4       **Q.    ARE YOU THE SAME DENISE THOMAS WHO FILED DIRECT**  
5           **TESTIMONY IN THIS CASE?**

6       A.    Yes, I am.

7       **Q.    WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

8       A.    My rebuttal testimony responds to the testimony of the Verizon Florida, Inc.  
9           ("Verizon") witness, Ms. Beverly Menard.

10      **Q.    WHAT IS YOUR FIRST ISSUE WITH RESPECT TO MS. MENARD'S**  
11           **DIRECT TESTIMONY?**

12      A.    My first problem with her testimony is the assumption that the five rate  
13           centers proposed by Verizon, and put into effect on February 1, 2001, are  
14           somehow the correct structure for Tampa because the Verizon tariff identifies  
15           five rate centers. What Verizon does or has done for its own internal  
16           functionality or operations is not the issue. Rather, from the beginning of  
17           local competition, the Local Exchange Routing Guide (LERG) has defined  
18           the rate areas that describe the Tampa metropolitan area. The LERG has  
19           always defined but a single Tampa rate center, identified simply as Tampa.

20      **Q.    BUT WHAT ABOUT HER STATEMENTS THAT THE ALEC NXX**  
21           **CODES HAVE REALLY BEEN ASSIGNED TO THE TAMPA**  
22           **CENTRAL RATE CENTER?**

1       A.     Again, what Verizon has done to route or handle calls is not the issue. All  
2             of the ALECs have entered the market, made their marketing plans, and  
3             configured their networks on the basis of a single Tampa rate center. Even  
4             Mr. Foley, testifying on behalf of NeuStar in this case, makes it clear that  
5             there is, or at least was, prior to February 1, 2001, only one Tampa rate  
6             center. The fact that we have a neutral, independent code administrator that  
7             is the current keeper of the LERG which reflects but the single Tampa rate  
8             center should only confirm this basic network fact.

9       **Q.     DO YOU AGREE WITH MS. MENARD'S RECOMMENDATION AT**  
10           **PAGE 10 OF HER TESTIMONY TO GRANDFATHER THE**  
11           **EXISTING ALEC NXX CODES?**

12       A.     No. As I and the other ALEC witnesses discussed in our direct testimonies,  
13             this creates potential numbering porting and pooling issues. More  
14             importantly, it will require that for new customers additional NXX codes be  
15             obtained. As Mr. Foley has testified, there is a very real potential of the  
16             premature exhaust of the 813 NPA.

17       **Q.     DO YOU AGREE WITH MS. MENARD'S TESTIMONY**  
18           **REGARDING THE POTENTIAL ISSUES FALLING OUT OF RATE**  
19           **CENTER CONSOLIDATION FOR THE TAMPA AREA?**

20       A.     I am not an attorney, so I am not qualified to address the legal issues raised  
21             by her testimony. However, if you accept her basic premise, it may follow  
22             that the legal or financial problems she has identified may result. But as I

1           have testified, she starts from the wrong position. The reality is not five rate  
2           centers, but the one Tampa rate center that has existed in the LERG and  
3           which all the ALECs and the rest of the world have always responded to  
4           when routing calls. What we are seeking is simply a return to what has  
5           always existed.

6           **Q.   WHAT ABOUT THE OTHER OPERATIONAL ISSUES MS.**  
7           **MENARD HAS DESCRIBED BEGINNING AT PAGE 16 OF HER**  
8           **TESTIMONY IN CONNECTION WITH “CONSOLIDATING”**  
9           **TAMPA RATE CENTERS?**

10          A.   I do not have access to all of the underlying operational matters she has  
11               identified. However, as her testimony makes clear, and the entire conduct of  
12               this entire issue also demonstrates, additional investigation and fact gathering  
13               is required. In the final analysis, I do not believe that this information would  
14               change the LERG reality of one Tampa rate center, but it may help Verizon  
15               transition its internal systems to that reality.

16          **Q.   DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

17          A.   Yes.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of the Rebuttal Testimony of Denise V. Thomas on behalf of WorldCom, Inc. in Docket 010102-TP have been served upon the following parties by Hand Delivery (\*) and/or U. S. Mail this 13th day of March, 2001.

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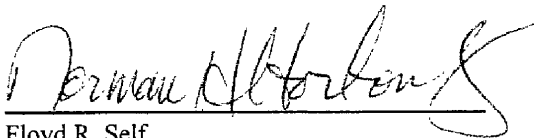
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